

A decorative graphic consisting of a grid of light gray squares, arranged in 10 rows and 10 columns. The squares are slightly offset and have a subtle gradient, creating a textured, grid-like background on the left side of the page.

# ***HIPAA Report on Compliance***

**Everstream**  
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Cleveland, OH 44115

**PREPARED BY: Joe Dylewski**  
**August 24, 2021**

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**This is not a guarantee of compliance.** This is a reasonable, best effort by ATMP Solutions to assist customers in identifying and remediating potential gaps in a company's compliance status. ATMP Solutions is reliant on the data provided by the customer. If this data is inaccurate, it is not the responsibility of ATMP Solutions. Management will make every effort to validate information wherever possible, but the final output and compliance status is the responsibility of the customer.

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## Document Control

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Issue Control			
<b>Document Reference</b>	7.0	<b>Project</b>	Everstream
<b>Issue</b>	1.0	<b>Date</b>	August 24, 2021
<b>Classification</b>	Original	<b>Author</b>	Joe Dylewski
<b>Document Title</b>	ATMP Solutions HIPAA Report on Compliance		
<b>Approved by</b>	Joseph J. Dylewski		
<b>Released by</b>	Joseph J. Dylewski		

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Revision History			
Issue #	Date	Author	Comments
1.0	November 10, 2012	Joe Dylewski	Risk Analysis Report
1.1	December 13, 2012	Joe Dylewski	Updated Interviewee List
1.2	June 27, 2013	Joe Dylewski	Interval Update
1.3	August 29, 2013	Joe Dylewski	Post Remediation Assessment
2.0	September 17, 2014	Joe Dylewski	2014 HIPAA Compliance Assessment - Final
3.0	September 17, 2015	Joe Dylewski	2015 HIPAA Compliance Assessment - Final
4.0	September 9, 2017	Joe Dylewski	2017 HIPAA Report on Compliance
5.0	June 11, 2019	Joe Dylewski	2019 HIPAA Report on Compliance
6.0	August 24, 2020	Joe Dylewski	2020 HIPAA Report on Compliance
7.0	August 24, 2021	Joe Dylewski	2021 HIPAA Report on Compliance

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## Executive Summary

An initial HIPAA compliance exercise that resulted in a positive compliance status ended in September 2013. In June 2021, ATMP Solutions was asked to conduct an exercise to validate controls established in this initial exercise. ATMP Solutions conducted meetings to:

1. Review control, infrastructure, personnel, and documentation changes related to HIPAA policies and procedures
2. Update documentation to reflect changes

ATMP Solutions has reviewed the controls with Everstream and confirms that based on this information; they have and continue to meet the minimum requirements for HIPAA and HITECH as per the published regulations for covered entities by HHS.

All applicable controls were reviewed on August 24, 2021 and based on information provided by Everstream

## Business Description

Everstream is a Midwest-based broadband company providing a full line of Voice, Data, and Internet services. It has grown to become a leader in broadband and communication technology with thousands of miles of secure carrier-grade fiber optic network and is continually providing new services to enhance business communication needs. Everstream builds client solutions by utilizing their fully owned and operated fiber optic network, 24/7 Network Management Center, technical support, and professional staff.

## Description of Scope of Work and Approach Taken

ATMP Solutions assisted Everstream in an assessment of HIPAA controls to validate HIPAA compliance. The HIPAA controls were initially established in September 2013. To complete this exercise, ATMP Solution executed a two-step approach:

### Step 1 - Update of existing controls

- Review of changes: policies, infrastructure, personnel, and documentation related to HIPAA policies and procedures
- Update of documentation to reflect changes

### Step 2 - Controls validation

- Assistance in remediation of audit findings
- Updated HIPAA compliance report
- Overall Compliance Status
- Overall Risk Rating
- List of Non-Compliant items with Industry Best Practices
- Suggested Remediation Steps



## Compliance/Non-Compliance Attestation

All applicable controls were assessed on August 24, 2021, and based on the information provided, Everstream LLC was found to be compliant with the controls stipulated by HIPAA at the time of this assessment.

HIPAA Citation	Description	Status
160.103	Definitions	Compliant
160.316	Refraining from Intimidation or Retaliation	Compliant
160.310	Responsibilities of Covered Entities	Compliant
160.306	Organizational Assessment, Policies, Standards and Procedures	Compliant
164.308(a)(1)(i)	Security Management Process	Compliant
164.308(a)(1)(ii)(A)	Risk Analysis	Compliant
164.308(a)(1)(ii)(B)	Risk Management	Compliant
164.308(a)(1)(ii)(C)	Sanction Policy	Compliant
164.308(a)(1)(ii)(D)	Information Systems Activity Review	Compliant
164.308(a)(2)	Assigned Security Responsibility	Compliant
164.308(a)(3)(i)	Workforce Security	Compliant
164.308(a)(3)(ii)(A)	Authorization and/or Supervision	Compliant
164.308(a)(3)(ii)(B)	Workforce Clearance Procedure	Compliant
164.308(a)(3)(ii)(C)	Termination Procedures	Compliant
164.308(a)(4)(i)	Information Access Management	Compliant
164.308(a)(4)(ii)(B)	Access Authorization	Compliant
164.308(a)(5)(i)	Security Awareness Training	Compliant
164.308(a)(5)(ii)(A)	Security Reminders	Compliant
164.308(a)(5)(ii)(B)	Protection from Malicious Software	Compliant
164.308(a)(5)(ii)(C)	Log-in Monitoring	Compliant
164.308(a)(5)(ii)(D)	Password Management	Compliant
164.308(a)(6)(i)	Security Incident Procedures	Compliant
164.308(a)(6)(ii)	Response and Reporting	Compliant
164.308(a)(7)(i)	Contingency Plan	Compliant
164.308(a)(7)(ii)(A)	Data Backup Plan	Compliant
164.308(a)(7)(ii)(B)	Disaster Recovery Plan	Compliant
164.308(a)(7)(ii)(D)	Testing and Revision Procedures	Compliant
164.308(a)(8)	Evaluation	Compliant
164.308(b)	Business Associate Contracts and Other Arrangements	Compliant
164.310(a)(1)	Facility Access Controls	Compliant

HIPAA Citation	Description	Status
164.310(a)(2)(i)	Contingency Operations	Compliant
164.310(a)(2)(ii)	Facility Security Plan	Compliant
164.310(a)(2)(iii)	Access Control and Validation Procedures	Compliant
164.310(a)(2)(iv)	Maintenance Records	Compliant
164.310(b)	Workstation Use	Compliant
164.310(c)	Workstation Security	Compliant
164.310(d)(1)	Device and Media Controls	Compliant
164.310(d)(2)(i)	Disposal	Compliant
164.310(d)(2)(ii)	Media Reuse	Compliant
164.310(d)(2)(iv)	Data Backup and Storage	Compliant
164.312(a)(1)	Access Control	Compliant
164.312(a)(2)(i)	Unique User Identification	Compliant
164.312(a)(2)(ii)	Automatic Logoff	Compliant
164.312(a)(2)(iii)	Encryption and Decryption	Compliant
164.312(b)	Audit Controls	Compliant
164.312(c)	Integrity Controls	Compliant
164.312(d)	Person or Entity Authentication	Compliant
164.312(e)(1)	Transmission Security	Compliant
164.312(e)(2)	Encryption	Compliant
164.316	Policies and procedures and documentation requirements	Compliant
164.404	Notification to individuals	Compliant
164.406	Notification to the Media	Compliant
164.408	Notification to the Secretary	Compliant
164.412	Delay in Breach Notification	Compliant
164.414	Compliance Framework	Compliant
164.501	PHI Definitions	Compliant
164.502	Uses and disclosures of protected health information	Compliant
164.504	Uses and disclosures	Compliant
164.506	Uses and disclosures to carry out treatment, payment, or health care operations	Compliant
164.508	Uses and disclosures for which an authorization is required	Compliant
164.510	Disclosure Limits and Restrictions	Compliant

HIPAA Citation	Description	Status
164.512	Uses and disclosures for which consent, an authorization, or opportunity to agree or object is not required	Compliant
164.514	Other requirements relating to uses and disclosures of protected health information	Compliant
164.520	Notice of privacy practices for protected health information	Compliant
164.522	Rights to request privacy protection for protected health information	Compliant
164.524	Access of individuals to protected health information	Compliant
164.526	Amendment of protected health information	Compliant
164.528	Accounting of disclosures of protected health information	Compliant
164.530	Administrative requirements	Compliant
170.210	Standards for health information technology to protect electronic health information created, maintained, and exchanged	Compliant





## **ATMP Solutions Overview**

ATMP Solutions, a Michigan based company, has a proven model to ensure Business Associates are meeting HIPAA standards and implementing effective HIPAA management practices.

With increased federal regulation and evolving technology, medical practices and covered entities are mandated to comply with higher security standards for electronic protected health information, such as medical records and patient billing. Recognizing these challenges, ATMP Solutions provides critical services to help large health systems, insurance companies, home health agencies, long-term care facilities, medical billing companies, and physician practices assess their security risks and manage compliance with the Health Insurance Portability and Accountability (HIPAA) Act.

The HIPAA Security Compliance Assessment is an accurate and thorough analysis of an organization's current HIPAA compliance status. This includes a deep examination of electronic medical record management and software where applicable. ATMP Solutions conducts a Risk Assessment and Gap Analysis and assists in developing a remediation plan that leads to compliance.

## **Scoping Accuracy Validation**

ATMP Solutions assisted Everstream in an assessment of HIPAA controls to validate HIPAA compliance. The HIPAA controls were initially established in September 2013.

ATMP Solutions has validated that the scope of this assessment, based on all information provided by Everstream and discovered by ATMP Solutions during the testing phases, is accurate and Everstream is taking steps to show reasonable effort to secure the Everstream environment as it aligns with the HIPAA Privacy and Security model.

Appendix A - Assessor Certification



**bsi.**

# Certificate



This document certifies that:

**Joseph Dylewski**

Has successfully completed:

**ISO/IEC 27001:2013 Lead Auditor (TPECS)**

And is deemed competent for:

**IS - Information Security Management Systems v2.1**

Passed Date: 1/28/2016

**AU - Management Systems Auditing v2.0**

Passed Date: 1/28/2016

**TL - Leading Management Systems Audit Teams v2.0**

Passed Date: 1/28/2016

BSI is an Exemplar Global certified training provider for the modules listed above.

For and on behalf of BSI:

Reg Blake, Vice President, Regulatory Affairs, BSI Group America Inc.

Course Date: 1/18/2016 - 1/21/2016

Certificate Number: 8438569-147283

Issue Date: 3/6/2016

CEUs Awarded: 3.2



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